

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

*

v.

* **Criminal Case No. RDB-11-0547**

MELANIE HOLQUIST

*

* * * * *

MOTION FOR EARLY TERMINATION OF SUPERVISED RELEASE

Defendant Melanie Holquist, through her undersigned counsel, Christopher C. Nieto, Esq., requests that, pursuant to 18 U.S.C. §3583 (e)(1), this Honorable Court grant early termination of her supervised release. Holquist has served more than two years of supervised release—without any infractions—and neither U.S. Probation nor the U.S. Attorney’s Office oppose this request. In support of this Motion, Holquist states the following:

1. Holquist pled guilty to Racketeering Conspiracy, in violation of 18 U.S.C. §1962(d). On December 17, 2012, the Court sentenced Holquist to 60 months, followed by three years of supervised release.
2. While serving her sentence, Holquist enrolled in and completed the residential drug and alcohol program offered by the Bureau of Prisons. She made every possible effort to rehabilitate herself, pay her debt to society and prepare to be a mother to her child upon release.
3. Holquist began supervised release in March of 2015. She has been drug tested and screened consistently since the inception of her release, and she has maintained her sobriety without exception. She never tested positive for any controlled substances, and she completed all drug treatment and counseling that was ordered for her.

4. Holquist has maintained consistent employment, first working at a 7-11 convenience store and now as a manager and server at a Denny's Restaurant on Merritt Boulevard, throughout her supervision. She takes a bus from Dundalk and walks ten blocks to her job almost every day. She keeps herself busy to minimize the potential for relapse and focuses on her family and daughter as motivation.

5. Holquist, along with her husband and daughter, rents a clean and stable house in northern Highland town for the past three months. She has wisely elected to not revisit the portions of South Baltimore where her criminal troubles began and has disassociated herself with the people from that area. She is proud of the progress she has made and the steps she has taken since her sentencing almost five years ago.

6. Under 18 U.S.C. §3583(e)(1), this Court has the authority to grant early termination of a previously imposed term of supervised release. Section 3583(e)(1) provides the following:

(e) Modification of conditions or revocation. The court may, after considering the factors set forth in section 3553(a)(1), (a)(2)(B), (a)(2)(C), (a)(2)(D), (a)(4), (a)(5), (a)(6) and (a)(7)

(1) terminate a term of supervised release and discharge the defendant released at any time after the expiration of one year of supervised release, pursuant to the provisions of the Federal Rules of Criminal Procedure relating to the modification of probation, if it is satisfied that such action is warranted by the conduct of the defendant released and the interest of justice[.]

18 U.S.C. §3583(e)(1); *see also* Fed. R. Crim.Proc 32.1(c)(1), (c)(2)(B), (c)(2)(C) (providing for hearings for modifications of supervised release, unless the result is favorable to the person supervised and the government does not object after notice).

7. As of this filing, Holquist has completed more than two years of supervised release. She has been fully compliant with all the terms and conditions of her supervision.

8. Undersigned counsel has spoken with Holquist's Probation Office, Bruce James. Mr. James stated that he does not oppose the early termination of Holquist's supervised release. Undersigned counsel also spoke with AUSA Robert Reeves Harding, and Mr. Harding does not object to this request but defers to the judgment of the Probation Office.

9. Holquist's satisfactory performance warrants a reduction in her term of supervised release. Accordingly, she respectfully moves this Honorable Court, pursuant to 18 U.S.C. §3583(e)(1), for early termination of her supervised release.

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on June 13, 2017, a copy of Defendant's Motion was sent to each of the parties via CM/ECF.

/s/

Christopher C. Nieto, #30031
Attorney for Ms. Holquist